

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

JOSE MIGUEL RODRIGUEZ MARTINEZ
ANA LESLINE HERNANDEZ BAEZ

DEBTORS

CASE NO. 15-03612/ESL

CHAPTER 13

**DEBTORS' MOTION REQUESTING ORDER
RE: AUTHORIZATION TO USE FUNDS FROM 2018 TAX REFUND**

TO THE HONORABLE COURT:

NOW COME, JOSE MIGUEL RODRIGUEZ MARTINEZ and ANA LESLIE HERNANDEZ BAEZ, the Debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. The Debtors' confirmed Plan dated June 22, 2015, provides that debtors' tax refunds will be paid into the Plan.
2. The Debtors have received the 2018 tax refund in the sum of \$1,869.00. Attached is copy of bank account statement, which reflects the direct deposit of the 2018 tax refund on May 13, 2019, issued by the Puerto Rico Treasury Department.
3. The Debtors respectfully submit to the Court that they need to use these funds to pay for: car repair and college expenses for their daughter. Attached is copy of car repair and college expenses estimate/invoice.
4. The Debtors need to use the funds from the 2018 "tax refund" to pay for these reasonable expenses. Furthermore, the Debtors are living within a very "tight" budget which barely covers their living expenses and a Plan payment of \$175.00.

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Debtor's Motion Requesting Order
Case no. 15-03612/ESL13

5. Based on the above-stated, the Debtors respectfully request this Court to Order the authorization of the use of these funds to allow the debtor to pay for this expense with the "tax refund".

WHEREFORE, the Debtors, through the undersigned attorney respectfully request that this Honorable Court grant the foregoing motion and allow the use of the funds from the 2018 tax refund by the debtors to pay for the above-stated expenses.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to debtors, Jose Miguel Rodriguez Martinez and Ana Leslie Hernandez Baez, to the address of record: Urb Delgado, A18 Calle 3, Caguas, PR 00725.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 27th day of May, 2019.

/s/ Roberto Figueroa Carrasquillo
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
USDC #203614
ATTORNEY FOR PETITIONERS
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX 787-746-5294
Email: rfigueroa@rfclawpr.com

Scotiabank - IAP/ITP Application (Top Page) - Internet Explorer

Client: JOSE M RODRIGUEZ MARTINEZ

Retail Account - History

CIF Key	00000000514677	Customer Name	JOSE M RODRIGUEZ MARTINEZ
Account	42003881	Transit	92015
Product Name	CUENTA DE AHORRO SCOTIA	Status	Active
Currency	USD		

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Current Balance	\$1 987 02	Available Balance	\$1 987 02
Balance Forward	\$1 323 90		
Transaction Amount	0 00	Transaction Date (YYYYMMDD)	

[Relative](#)

Posting Date	Transaction	Cheque Number	Txn Amount
0520	AUTO TELLER-DEBIT ATDIBW - REPARTO IND VILLA24 1 CAGUAS PR		1500 00
0515	0509675 5118580711558980 609675		15370 00
0515	WITHDRAWAL		55 70
0515	DEBIT REVERSAL		150 70
0515	WITHDRAWAL		5977 22
0515	SPEC AUTH CREDIT - 2100002442307 WAL-MART PUERTO PAYROLL		
0513	SPEC AUTH CREDIT - 21502018822184 DEPTO HACIENDA REINTEGRO		51 809 00
0513	AUTO TELLER-DEBIT ATDIBW - REPARTO IND VILLA24 1 CAGUAS PR		15200 00
0513	0607435 5118580711558980 607435		154 00
0513	BACKDATED SERVICE CHARGE - Para 30AER19		154 00
0513	WITHDRAWAL		154 00

12:20 PM TOIGUHP25102P TOIFCTXC65P1P3C01M032W



UNIVERSIDAD ANA G. MÉNDEZ
OFICINA DE TESORERÍA

ESTADO DE CUENTA

Fecha: lunes, 13 de mayo de 2019

Certifico que el (la) estudiante tiene PAOLA RODRIGUEZ
el siguiente estado de cuenta: HERNANDEZ

Núm. Identificación 1934

Balance Anterior: \$0.00

Créditos Matriculados 12 Horas Contacto: 12 Créditos de Baja: 0

Término SEGUNDO SEM 2018-2019 (201902) 201902

Matrícula \$2,460.00

Cuotas Generales \$450.00

Laboratorios \$50.00

Libros \$0.00

Cuota de Graduación \$0.00

Otros Cargos/Ajustes \$55.00

Transferencias \$0.00

TOTAL CARGOS \$3,015.00

CHEQUES EMITIDOS \$0.00

TOTAL GENERAL \$3,015.00

Créditos a la cuenta:

Beca Pell \$1,972.00

Préstamo \$0.00

Ayudas \$0.00

Pagos \$5.00

TOTAL BECAS Y PAGOS \$1,977.00

BALANCE ACTUAL \$1,038.00

Efectúe el pago de cualquier balance pendiente en la Oficina de Tesorería o localidad de estudio

OFICINA DE TESORERÍA

MAY 13 2019



CLUB #6689
PLAZA CENTRO II
CAGUAS PR 00725

Jose Rodriguez
787-743-6765
787-247-7142

Savings Made Simple

05/17/2019 06:13:38

TIRE QUOTE

ALL TIRE PRICES ARE GOOD FOR TODAY ONLY.
IT IS OUR INTENT TO HAVE EVERY ITEM IN
STOCK. OCCASIONALLY, ITEMS MAY NOT BE AVAILABLE.
WE RESERVE THE RIGHT TO LIMIT QUANTITIES.
PRICES DO NOT INCLUDE TAXES AND TIRE FEES.

VEHICLE DESCRIPTION

PURCHASE DESCRIPTION	PRICE	EXTENDED PRICE
BEST		
195/65R15 91T VIVA 3	4 @ 84.24	336.96
TPMS Replacement	4 @ 5.00	20.00
Tire Plan	4 @ 15.00	60.00
WARRANTY KILOMETERS: 60,000		
ORIGINAL TREAD DEPTH: 9 / 32		416.96



195/65R15 91T VIVA 3

Installation charge with purchase of TPMS Sensor. Non-transferable benefits & svcs. to purchasing Member w/active Sams Club Membership. Premium Tire Pkg.: Stem or TPMS reset- if applicable, mount, lifetime balance & rotation, flat repair & road hazard protection. TPMS parts extra.

SAM'S CLUB
TBC



CLUB #6689
PLAZA CENTRO II
CAGUAS PR 00725

Jose Rodriguez
787-743-6765
787-247-7142

Savings Made Simple

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TIRE QUOTE

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VEHICLE DESCRIPTION

PURCHASE DESCRIPTION BEST	PRICE	EXTENDED PRICE
185/60R1482H SN250AS	4 @ 76.98	307.92
TPMS Replacement	4 @ 5.00	20.00
Tire Plan	4 @ 15.00	60.00
WARRANTY KILOMETERS: 75,000		
ORIGINAL TREAD DEPTH: 11 / 32		387.92



185/60R1482H SN250AS

Installation charge with purchase of TPMS Sensor. Non-transferable benefits & svcs. to purchasing Member w/active Sams Club Membership. Premium Tire Pkg.: Stem or TPMS reset- if applicable, mount, lifetime balance & rotation, flat repair & road hazard protection. TPMS parts extra.